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soils from the Central Avenue Ditch (IHSS 157.1 for OU-13 and adjacent IHSS 172 for OU-8) into areas adjacent to the two large fuel oil tanks located on the southwest corner of Central Avenue and Seventh Street (IHSS 152). The operation was immediately shut down due to the potential of cross contamination from one or more IHSSs to IHSS 152. A thorough review of the operation noted that Plant Services was instructed to spread the ditch spoils into IHSS 152 by EG&G Construction Management without the approval from ERM.

The impact of this action will require additional sampling from one location for analytical parameters required in the OU-13 Work Plan (for IHSS 157.1). Due to the fact that the Central Avenue Ditch (IHSS 157.1) underwent a High Purity Germanium (HPGe) radiological survey both before the disturbance and again afterward and no radiological contamination was observed above background levels in both cases, we do not suggest enlarging the IHSS 157.1 boundary.

In the event that soil sampling results indicate potential cross contamination from one IHSS to another, we recommend that the area be investigated during implementation of OU-12 Integrated Surface Water and Sediment Field Sampling Plan.

Effective no later than December 1, 1993, the following EG&G actions will have taken place to prevent a similar incident from occurring in the future:

1. Memorandum of Understanding (MOU) between EG&G Construction Management and EG&G ERM outlining responsibilities as stated in the draft procedure #1-F20-ER-EMR-EM.001 "Environmental Approval Process for Construction/Excavation Activities on or Near Individual Hazardous Substance Sites".
2. All Environmental Assessments for Construction Activities (Soils Disturbance Permits) involving IHSSs, Potential Areas of Concern (PACs) or Additional Areas of Concern (AACs) will be reviewed by the appropriate ERM Operable Unit Manager. Complete documentation will be available from the ERM Environmental Operations Manager. This process will also be applicable to spills or releases in or near an IHSS, PAC, or AAC. Completed October 12, 1993.
3. ERM Environmental Operations Manager (or designee) will conduct a briefing to EG&G Plant Services personnel clarifying the importance of following proper guidance requirements and stressing the importance when conducting work in or near an IHSS. Completed November 12, 1993.
4. Assign additional ERM oversight to construction projects involving activities in or near an IHSS, PAC, or AAC. Also, include within some IWCPs a hold point where work will stop until the ERM Environmental Operations Manager (or designee) arrives at the site.

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5. Provide for one additional soil sample to be collected during the implementation Phase I RFI/RI Non-Intrusive Investigation For Surficial Soil Sampling - OU-13. The additional analytical cost will be incurred under Work Package No. 61303 "Environmental Support To Plant Operations".

This incident will be reported in the next quarterly update report to the Historical Release Report (HRR) due January 31, 1994. Based on the above data and stated actions, EG&G requests concurrence to re-initiate the ditch cleaning efforts prior to snowfall.

If you have any questions or concerns regarding this response, please contact Nick Demos at extension 6938 or digital page 3842 or Bruce Peterman at extension 8659.



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EG&G Rocky Flats, Inc.

NSD:lmw

Attachment:
As Stated

Orig. and 1 cc - J. K. Hartman

cc:

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A. H. Pauole	-	" "
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